

Deposition		Defenat Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Initial Designations					Defenat Kevin Fowler's Objections to Counter-Designations
WITNESS	Date	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
John Barrowman	5/26/2021	5:18-6:2	5	18	6	2		6:5-11	6	5	6	11	Relevance (FRE 401); counsel's statements are not evidence; confuses the issues (FRE 403)
John Barrowman	5/26/2021	6:12-17	6	12	6	17		10:10-12	10	10	10	12	
John Barrowman	5/26/2021	7:3-13	7	3	7	13		19:17-20:3	19	17	20	3	Relevance (FRE 401); confuses the issues and undue consumption of time (FRE 403)
John Barrowman	5/26/2021	7:24-8:23	7	24	8	23		20:6-14	20	6	20	14	
John Barrowman	5/26/2021	10:13-25	1	13	10	25		21:13-18	21	13	21	18	
John Barrowman	5/26/2021	11:5-25	11	5	11	25		21:24-22:11	21	24	22	11	
John Barrowman	5/26/2021	12:24-14:16	12	24	14	16		23:21-24:9	23	21	24	9	Nonresponsive
John Barrowman	5/26/2021	14:21-18:8	14	21	18	8		26:4-6	24	4	24	6	
John Barrowman	5/26/2021	18:15-19:16	18	15	19	16		28:11-13	28	11	28	13	
John Barrowman	5/26/2021	20:4-5	20	4	20	5		28:22-29:3	28	22	29	3	
John Barrowman	5/26/2021	20:15-21:12	20	15	21	12		29:20-22	29	20	29	22	
John Barrowman	5/26/2021	21:19-23	21	19	21	23		31:23-32-10	31	23	32	10	
John Barrowman	5/26/2021	22:12-23:20	22	12	23	20		33:2-8	33	2	33	8	
John Barrowman	5/26/2021	24:10-19	24	10	24	19		33:21-34:22	33	21	34	22	Relevance (FRE 401); confuses the issues and undue consumption of time (FRE 403); Hearsay (FRE 801, 802)
John Barrowman	5/26/2021	25:1-26:3	25	1	26	3		40:23-41:5	40	23	41	5	Lacks personal knowledge/speculation regarding what "everyone" believes or intended (FRE 602)
John Barrowman	5/26/2021	27:3-28:10	27	3	28	10	Objection is made to page 27:4-6 as to everything after the word "No." as guessing and speculation	46:7-8	46	7	46	8	
John Barrowman	5/26/2021	28:14-21	28	14	28	21		46:12-48:15	46	12	48	15	Improper designation/nonresponsive to Mr. Fowler's designations; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cumulative (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	29:4-8	29	4	29	8		49:7-11	49	7	49	11	Improper designation/nonresponsive to Mr. Fowler's designations; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cumulative (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	29:13-19	29	13	29	19		49:22-50:6	49	22	50	6	Improper designation/nonresponsive to Mr. Fowler's designations; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cumulative (FRE 403); hearsay (FRE 801, 802)

John Barrowman	5/26/2021	29:23-30:6	29	23	30	6		58:5-10	58	5	58	10	Improper designation/nonresponsive to Mr. Fowler's designations; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cumulative (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	30:14-31:22	30	14	31	22		60:21-24	60	21	60	24	
John Barrowman	5/26/2021	35:5-40:22	35	5	40	22		62:10-63:12	62	10	63	12	
John Barrowman	5/26/2021	41:6-42:21	41	6	42	21		63:20-65:5	63	20	65	5	Improper designation/nonresponsive to Mr. Fowler's designations; relevance (FRE 401); confuses the issues, misleads the jury, undue consumption of time, cumulative, undue consumption of time (FRE 403); hearsay (FRE 801, 802); lack of personal knowledge/speculation regarding Mr. Fowler's state of mind (FRE 602)
John Barrowman	5/26/2021	43:12-44:22	43	12	44	22	44:8-14 Heresay	68:7-12	68	7	68	12	
John Barrowman	5/26/2021	45:12-22	45	12	45	22		68:16-69-4	68	16	69	4	
John Barrowman	5/26/2021	46:1-6	46	1	46	6		70:4-5	70	4	70	5	Mr. Barrowman's opinion regarding what is appropriate is irrelevant (FRE 401); misleading the jury, confusing the issues (FRE 403)
John Barrowman	5/26/2021	46:9-11	46	9	46	11		70:12-15	70	12	70	15	
John Barrowman	5/26/2021	55:22-56:3	55	22	56	3		71:19-20	71	19	71	20	Vague and ambiguous; Calls for speculation/lack of personal knowledge (FRE 602); Hearsay (FRE 801, 802)
John Barrowman	5/26/2021	56:6-7	56	6	56	7		71:22-23	71	22	71	23	Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	56:9-15	56	9	56	15		71:25-72:1	71	25	72	1	
John Barrowman	5/26/2021	56:18-57:5	56	18	57	6		72:4-72:15	72	4	72	15	
John Barrowman	5/26/2021	57:13-58:4	57	13	58	4		73:18-20	73	18	73	20	Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802); Cummulative, undue consumption of time (FRE 403)
John Barrowman	5/26/2021	58:11-13	58	11	58	13		73:23-24	73	23	73	24	Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802); cumulative, undue consumption of time (FRE 403)

John Barrowman	5/27/2021	58:17-59:1	58	17	59	1		74:2-5	74	2	74	5	Improper designation/nonresponsive to Mr. Fowler's designation; Assumes facts; argumentative; lacks personal knowledge/speculation regarding Mr. Rapp's allegations (FRE 602); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	59:10-60:14	59	10	60	14		74:9-11	74	9	74	11	Improper designation/nonresponsive to Mr. Fowler's designation; cumulative, unfairly prejudicial, undue consumption of time (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	60:16-17	60	16	60	17		74:13-15	74	13	74	15	Improper designation/nonresponsive to Mr. Fowler's designation; cumulative, unfairly prejudicial, undue consumption of time (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	69:6-70:3	69	6	70	3		74:17-19	74	17	74	19	Improper designation/nonresponsive to Mr. Fowler's designation; unfairly prejudicial, cumulative, undue consumption of time (FRE 403); hearsay (FRE 801, 802)
John Barrowman	5/26/2021	70:16-71:1	70	16	71	1		74:21-75:6	74	21	75	6	75:4-6: speculation/lacks personal knowledge (FRE 602); hearsay (FRE 801, 802); undue consumption of time, confuses the issues (FRE 403)
John Barrowman	5/26/2021	71:3-10	71	3	71	10		75:11-25	75	11	75	25	Speculation/lacks personal knowledge (FRE 602); hearsay (FRE 801, 802); relevance (FRE 401)
John Barrowman	5/26/2021	71:14-17	71	14	71	17							Improper designation/nonresponsive to Mr. Fowler's designation; hearsay (FRE 801, 802); cumulative, undue consumption of time (FRE 403); 76:21-24: lacks personal knowledge speculation (FRE 602)
John Barrowman	5/26/2021							76:15-24	76	15	76	24	Speculation/lacks personal knowledge (FRE 602)
John Barrowman	5/26/2021	73:15-17	73	15	73	17		77:3-10	77	3	77	10	Confuses the issues, misleads the jury, unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021	85:5-11	85	5	85	11		77:12-13	77	12	77	13	Confuses the issues, misleads the jury, unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021	85:22-86:12	85	22	86	12		77:16-77:16	77	16	77	16	Confuses the issues, misleads the jury, unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021	87:4-7	87	4	87	7		77:21-77:21	77	21	77	21	Confuses the issues, misleads the jury, unfairly prejudicial (FRE 403)
John Barrowman	5/26/2021							80:22-80:25	80	22	80	25	
John Barrowman	5/26/2021							81:4-81:13	81	4	81	13	
John Barrowman	5/26/2021												Lacks personal knowledge/speculation regarding what Mr. Fowler believed or intended (FRE 602)
John Barrowman	5/26/2021							81:15-81:21	81	15	81	21	
John Barrowman	5/26/2021							82:2-82:4	82	2	82	4	Vague and ambiguous

John Barrowman	5/26/2021							86:25-87:3	86	25	87	3	Improper designation/nonresponsive to Mr. Fowler's designations; hearsay (FRE 801, 802)
----------------	-----------	--	--	--	--	--	--	------------	----	----	----	---	---

Deposition		Defenant Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Counter-Designations					Defenant Kevin Fowler's Objections to Counter-Designations
WITNESS	Date	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
Michael Collins, PhD	4/27/2021	5:10-17	5	10	5	17		6:20-23	6	20	6	23	
Michael Collins, PhD	4/27/2021	5:20-6:5	5	2	6	5		10:5-13	10	5	5	13	
Michael Collins, PhD	4/27/2021	6:10-19	6	10	6	19		16:17-20	16	17	16	20	
Michael Collins, PhD	4/27/2021	6:24-7:7	6	24	7	7		29:11-24	29	11	29	24	
Michael Collins, PhD	4/27/2021	8:18-10:4	8	18	10	4		30:3-31:6	30	3	31	6	
Michael Collins, PhD	4/27/2021	15:22-16:16	15	22	16	16		31:12-32:19	31	12	32	19	
Michael Collins, PhD	4/27/2021	16:25-29:10	16	25	29	10		33:6-34:6	33	6	34	6	
Michael Collins, PhD	4/27/2021	31:9-11	31	9	31	11		34:11-35:8	34	11	35	8	
Michael Collins, PhD	4/27/2021	32:20-33:5	32	20	33	5		39:23-40:12	39	23	40	12	
Michael Collins, PhD	4/27/2021	35:9-12	35	9	35	12		43:23-44:10	43	23	44	10	
Michael Collins, PhD	4/27/2021	37:19-38:8	37	19	38	8		44:17-46:2	44	17	46	2	
Michael Collins, PhD	4/27/2021	38:15-39:22	38	15	39	22		50:12-17	50	12	50	17	Relevance of Dr. Collins' treatment other patients (FRE 401); confuses the issues, and undue consumption of time (FRE 403)
Michael Collins, PhD	4/27/2021	41:4-43:22	41	4	43	22		50:20-52:11	50	20	52	11	Relevance of Dr. Collins' treatment other patients (FRE 401); confuses the issues, and undue consumption of time (FRE 403)
Michael Collins, PhD	4/27/2021	44:11-16	44	11	44	16		52:13-53:17	52	13	53	17	Relevance of Dr. Collins' treatment other patients (FRE 401); confuses the issues, and undue consumption of time (FRE 403)
Michael Collins, PhD	4/27/2021	46:4-16	46	4	46	16	Objection to page 46:11-13 as to relevance	53:21-23	53	21	53	23	
Michael Collins, PhD	4/27/2021	47:2-10	47	2	47	10		53:25-53:25	53	25	53	25	
Michael Collins, PhD	4/27/2021	47:12-49:18	47	12	49	18		54:2-54:12	54	2	54	12	
Michael Collins, PhD	4/27/2021	57:25-58:17	57	25	58	17		54:14-19	54	14	54	19	
Michael Collins, PhD	4/27/2021	58:22-61:17	58	22	61	17		57:9-13	57	9	57	13	Compound
Michael Collins, PhD	4/27/2021	62:4-19	62	4	62	19		57:16-18	57	16	57	18	
Michael Collins, PhD	4/27/2021							61:18-62:3	61	18	62	3	
Michael Collins, PhD	4/27/2021							63:6-21	63	6	63	21	Relevance (FRE 401); confuses the issues and misleads the jury (FRE 403); lack of personal knowledge/speculation (FRE 602)
Michael Collins, PhD	4/27/2021							64:2-4	64	2	64	4	Speculaiton/lack of personal knowledge (FRE 602); vague and ambiguous; incomplete hypothetical
Michael Collins, PhD	4/27/2021							64:6-64:6	64	6	64	6	Speculaiton/lack of personal knowledge (FRE 602); vague and ambiguous; incomplete hypothetical
Michael Collins, PhD	4/27/2021							64:9-14	64	9	64	14	Speculaiton/lack of personal knowledge (FRE 602)
Michael Collins, PhD	4/27/2021							64:16-64:16	64	16	64	16	

Deposition		Defenant Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Counter-Designations					Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
12/16/2021	Adam Vary	9:17-19	9	17	9	19		9:7-12	9	7	9	12	
12/16/2021	Adam Vary	12:5-7	12	5	12	7		9:25-10:1	9	25	10	1	
12/16/2021	Adam Vary	39:17-40:5	39	17	40	5	40:4-5 Privilege, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation.	12:8-13:12	12	8	13	12	Relevance (FRE 401); undue consumption of time (FRE 403)
12/16/2021	Adam Vary	40:11-12	40	11	40	12	40:11-12 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	13:15-13:15	13	15	13	15	
12/16/2021	Adam Vary	41:12-15	41	12	41	15	41:12-15 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	13:17-22	13	17	13	22	
12/16/2021	Adam Vary	41:23-42:6	41	23	42	6	41:23-43:6 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	14:1-15:15	14	1	15	15	Relevance (FRE 401); undue consumption of time (FRE 403)
12/16/2021	Adam Vary	42:11-12	42	11	42	12	42:11-12 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	15:23-16-23	15	23	16	23	Relevance (FRE 401); undue consumption of time (FRE 403)
12/16/2021	Adam Vary	48:9-16	48	9	48	16	48:9-16 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	20:4-17	20	4	20	17	Relevance (FRE 401); undue consumption of time (FRE 403)
12/16/2021	Adam Vary	48:22-23	48	22	48	23	48:22-23 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	40:14-16	40	14	40	16	
12/16/2021	Adam Vary	48:25-49:3	48	25	49	3		59:1-7	59	1	59	7	
12/16/2021	Adam Vary	49:6-18	49	6	49	18		62:21-63:5	62	21	63	5	
12/16/2021	Adam Vary	49:21-50:3	49	21	50	3		64:8-10	64	8	64	10	
12/16/2021	Adam Vary	50:8	50	8	50	8		64:16-64:16	64	16	64	16	
12/16/2021	Adam Vary	50:10-12	50	10	50	12		71:12-15	71	12	71	15	
12/16/2021	Adam Vary	50:15-24	50	15	50	24		73:1-16	73	14	73	16	73:10-12: counsel's statements are not evidence
12/16/2021	Adam Vary	51:5-13	51	5	51	13	51:5-13 Privilege, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	74:18-24	74	18	74	24	

12/16/2021	Adam Vary	53:19-22	53	19	53	22	value substantially outweighed by a danger	76:9-13	76	9	76	13	
12/16/2021	Adam Vary	55:1-3	55	1	55	3	55:1-3 Privilege, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	76:15-18	76	15	76	18	
12/16/2021	Adam Vary	57:20-24	57	20	57	24	57:20-24 Privilege, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	77:17-78-18	77	17	78	18	
12/16/2021	Adam Vary	58:17-25	58	17	58	25		80:21-81:4	80	21	81	4	
12/16/2021	Adam Vary	59:13-16	59	13	59	16		83:10-15	83	10	83	15	
12/16/2021	Adam Vary	62:15-20	62	15	62	20		85:22-23	85	22	85	23	
12/16/2021	Adam Vary	65:16-20	65	16	65	20	65:16-20 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	87:17-19	87	17	87	19	
12/16/2021	Adam Vary	65:25-66:1	65	25	66	1	65:25-66:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	91:2-5	91	2	91	5	
12/16/2021	Adam Vary	70:7-22	70	7	70	22	70:7-22 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	91:7-10	91	7	91	10	
12/16/2021	Adam Vary	71:3-11	71	3	71	11	71:3-11 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	95:20-22	90	20	90	22	
12/16/2021	Adam Vary	71:16-20	71	16	71	20	substantially outweighed by a danger of	95:24-25	95	24	90	25	
12/16/2021	Adam Vary	72:1-73:6	72	1	73	6	72:1-73:6 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	97:2-5	97	2	97	5	
12/16/2021	Adam Vary	73:17-74:17	73	17	74	17	73:17-74:17 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	97:8-12	97	8	97	12	
12/16/2021	Adam Vary	74:25-75:17	74	25	75	17	74:25-75:17 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	97:21-25	97	21	97	25	
12/16/2021	Adam Vary	76:1-8	76	1	7	68	76:1-8 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	99:21-100:5	99	21	100	5	

12/16/2021	Adam Vary	76:22-77:11	76	22	77	11	76:22-77:11 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	104:14-105:12	104	14	105	12	
12/16/2021	Adam Vary	89:12-90:7	89	12	90	7	89:12-90:7 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	105:17-25	105	17	105	25	
12/16/2021	Adam Vary	90:10-11	90	10	90	11	90:10-90:11 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	106:2-106:2	106	2	106	2	
12/16/2021	Adam Vary	92:20-21	92	20	92	21	92:20-21 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	114:25-115:2	114	25	115	2	
12/16/2021	Adam Vary	92:23-93:2	92	23	93	2	92:23-93:2 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	118:25-119:3	118	25	119	3	
12/16/2021	Adam Vary	93:4	93	4	93	4	93:4-93:4 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	126:2-3	126	2	126	3	
12/16/2021	Adam Vary	93:6-7	93	6	93	7	93:6-93:7 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	126:10-12	126	10	126	12	
12/16/2021	Adam Vary	93:15-16	93	15	93	16	93:15-93:16 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	128:12-16	128	12	128	16	Lack of personal knowledge/speculation (FRE 602); calls for expert testimony (FRE 701, 702)
12/16/2021	Adam Vary	93:19	93	19	93	19	93:19-93:19 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	128:19-21	128	19	128	21	Lack of personal knowledge/speculation (FRE 602); calls for expert testimony (FRE 701, 702)
12/16/2021	Adam Vary	93:21-25	93	21	93	25	93:21-93:25 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	130:5-6	130	5	130	6	
12/16/2021	Adam Vary	94:5-14	94	5	94	14	94:5-94:14 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	130:13-130:13	130	13	130	13	
12/16/2021	Adam Vary	94:19-21	94	19	94	21	96:13-96:19 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	130:15-17	130	15	130	17	
12/16/2021	Adam Vary	95:6-8	95	6	95	8	95:6-95:8 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	131:3-131:3	131	3	131	3	



12/16/2021	Adam Vary	95:10-14	95	10	95	14	95:10-95:14 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	132:25-133:3	132	25	133	3	
12/16/2021	Adam Vary	95:16-18	95	16	95	18	95:16-95:18 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	133:5-11	133	5	113	11	
12/16/2021	Adam Vary	96:9-11	96	9	96	11	96:9-96:11 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	133:19-23	133	19	133	23	
12/16/2021	Adam Vary	96:13-19	96	13	96	19	96:13-19 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, undue delay, wasting time.	134:2-9	134	2	134	9	
12/16/2021	Adam Vary	97:14-20	97	14	97	20	97:14-20 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	136:15-19	136	15	136	19	
12/16/2021	Adam Vary	98:1-12	98	1	98	12	98:4-12 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	138:19-22	138	19	138	22	
12/16/2021	Adam Vary	98:21-99:6	98	21	99	6	substantially outweighed by a danger of	150:11-14	150	11	150	14	
12/16/2021	Adam Vary	99:13-20	99	13	99	20	substantially outweighed by a danger of	150:17-22	150	17	150	22	
12/16/2021	Adam Vary	100:6-16	100	6	100	16	100:6-16 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	150:24-151:2	150	24	151	2	
12/16/2021	Adam Vary	100:25-101:6	100	25	101	6	100:25-101:6 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	151:6-15	151	6	151	15	Nonresponsive
12/16/2021	Adam Vary	105:13-16	105	13	105	16	105:13-16 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	161:12-15	161	12	161	15	
12/16/2021	Adam Vary	113:16-22	113	16	113	22	113:20-22 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	161:21-162:8	161	21	162	8	Nonresponsive
12/16/2021	Adam Vary	113:24-114:5	113	24	114	5	113:24-114:5 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	163:14-19	163	14	163	19	
12/16/2021	Adam Vary	114:20-24	114	20	114	24	114:20-114:24 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	165:23-166-12	165	23	166	12	166:5: Move to strike after "did I" as nonresponsive; speculation (FRE 602); improper opinion testimony regarding "common practices"

12/16/2021	Adam Vary	117:11-118:24	117	11	118	24	117:11-118:24 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	168:10-13	168	10	168	13	
12/16/2021	Adam Vary	119:4-5	119	4	119	5	119:4-119:5 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	168:19-23	168	19	168	23	
12/16/2021	Adam Vary	119:12-13	119	12	119	13	119:12-13 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	170:12-17	170	12	170	17	
12/16/2021	Adam Vary	119:15-120:12	119	15	120	12	119:15-120:12 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	172:18-24	172	18	172	24	Invades fact-finding province of jury
12/16/2021	Adam Vary	120:22-121:1	120	22	121	1	120:22-120:24 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time; 120:25-121:1 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	231:22-232:1	231	22	232	1	
12/16/2021	Adam Vary	121:8-12	121	8	121	12	121:8-121:9 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value. ; 121:10-121:12 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	232:5-233:7	232	5	233	7	
12/16/2021	Adam Vary	121:15-25	121	15	121	25	121:15-121:25 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	250:24-251:1	250	24	251	1	
12/16/2021	Adam Vary	122:6-10	122	6	122	10	122:6-8 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative evidence. 122:9-10 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative.	254:8-12	254	8	254	12	

12/16/2021	Adam Vary	122:16-21	122	16	122	21	122:16-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value. 122:18-21 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative.	254:15-254:15	254	15	254	15	
12/16/2021	Adam Vary	123:4-11	123	4	123	11	123:4-5 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value; 122:6-11 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	254:17-18	254	17	254	18	
12/16/2021	Adam Vary	123:12-14	123	12	123	14	123:12-14 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, improper characterization, lack of foundation.	254:21-255:9	254	21	255	9	
12/16/2021	Adam Vary	124:8-9	124	8	124	9	124:8-9 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	255:14-15	255	14	255	15	
12/16/2021	Adam Vary	124:11-13	124	11	124	13	124:11-13 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, improper characterization, lack of foundation.	255:20-25	255	20	255	25	Impermissible expert testimony regarding Mr. Vary's "observation[s] across the profession." (FRE 701, 702)
12/16/2021	Adam Vary	124:20-25	124	20	124	25	124:20-21 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	256:17-23	256	17	256	23	
12/16/2021	Adam Vary	125:9-12	125	9	125	12		257:1-4	257	1	257	4	
12/16/2021	Adam Vary	125:17-126:1	125	17	126	1		257:15-16	257	15	257	16	
12/16/2021	Adam Vary	126:14-23	126	14	126	23	126:20-23 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative evidence.	257:18-21	257	18	257	21	Impermissible expert testimony regarding Mr. Vary's observations across the profession (FRE 701, 702)

12/16/2021	Adam Vary	127:7-11	127	7	127	11	127:7-11 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative evidence.	257:23-258:6	257	23	258	6	Impermissible expert testimony regarding Mr. Vary's observations across the profession (FRE 701, 702)
12/16/2021	Adam Vary	127:13-17	127	13	127	17	127:13-17 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative evidence.	258:12-25	258	12	258	25	
12/16/2021	Adam Vary	128:23-24	128	23	128	24	128:23-24 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	259:23-25	259	23	259	25	
12/16/2021	Adam Vary	129:5-6	129	5	129	6	129:5-6 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	260:6-9	260	6	260	9	
12/16/2021	Adam Vary	131:5-7	131	5	131	7	131:5-131:7 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	260:11-22	260	11	260	22	
12/16/2021	Adam Vary	131:14-23	131	14	131	23	131:14-131:23 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	260:25-261:6	260	25	261	6	261:4-6 asked and answered; cumulative
12/16/2021	Adam Vary	135:2-5	135	2	135	5	135:2-5 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	261:8-10	261	8	261	10	Asked and answered; cumulative
12/16/2021	Adam Vary	135:22-25	135	22	135	25	135:22-25 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	261:12-262:3	261	12	262	3	262: 1-3 Asked and answered; cumulative
12/16/2021	Adam Vary	136:1-3	136	1	136	3	136:1-3 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	262:6-10	262	6	262	10	Asked and answered; cumulative
12/16/2021	Adam Vary	136:6-14	136	6	136	14	136:6-14 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	264:10-16	264	10	264	16	
12/16/2021	Adam Vary	136:20-25	136	20	136	25	136:20-25 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	264:22-266:3	264	22	266	3	
12/16/2021	Adam Vary	137:1-11	137	1	137	11	137:1-11 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	266:13-18	266	13	266	18	Speculation/lacks personal knowledge (FRE 602); best evidence

12/16/2021	Adam Vary	137:13-18	137	13	137	18	137:13-18 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	266:21-25	266	21	266	25	Speculation/lacks personal knowledge (FRE 602); best evidence
12/16/2021	Adam Vary	137:23-24	137	23	137	24	137:23-24 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	267:2-3	267	2	267	3	Relevance (FRE 401); undue consumption of time, confuses the issues (FRE 403)
12/16/2021	Adam Vary	138:3-9	138	3	138	9	138:3-9 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	267:10-14	267	10	267	14	Relevance (FRE 401); undue consumption of time, confuses the issues (FRE 403)
12/16/2021	Adam Vary	138:10-12	138	10	138	12	138:10-12 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	267:16-21	267	16	267	21	
12/16/2021	Adam Vary	138:23-139:6	138	23	139	6	138:23-25 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	268:2-6	268	2	268	6	Speculation/lacks personal knowledge (FRE 602); best evidence
12/16/2021	Adam Vary	139:9-11	139	9	139	11	139:9-11 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	268:10-12	268	10	268	12	Speculation/lacks personal knowledge (FRE 602); best evidence
12/16/2021	Adam Vary	139:13-14	139	13	139	14	139:13-14 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	268:19-22	268	19	268	22	Speculation/lacks personal knowledge (FRE 602); best evidence
12/16/2021	Adam Vary	139:17-21	139	17	139	21	139:17-21 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	268:24-269:1	268	24	269	1	Speculation/lacks personal knowledge (FRE 602); best evidence
12/16/2021	Adam Vary	140:8-10	140	8	140	10	140:8-10 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	269:3-269:3	269	3	269	3	Speculation/lacks personal knowledge (FRE 602); best evidence
12/16/2021	Adam Vary	140:17-18	140	17	140	18	140:17-18 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	269:6-8	269	6	269	8	
12/16/2021	Adam Vary	140:20-22	140	20	140	22	140:20-22 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	269:17-270:4	269	17	270	4	270:2-4: Calls for speculation (FRE 602); incomplete hypothetical

12/16/2021	Adam Vary	141:3-18	141	3	141	18	141:3-15 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time; 141:16-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	270:8-12	270	8	270	12	Calls for speculation (FRE 602); incomplete hypothetical
12/16/2021	Adam Vary	141:24-25	141	24	141	25	141:24-25 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.	270:14-16	270	14	270	16	Calls for speculation (FRE 602); incomplete hypothetical; compound
12/16/2021	Adam Vary	142:2-18	142	2	142	18	142:2-15 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time; 142:16-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.	270:21-25	270	21	270	25	improper opinion testimony about general media practices (FRE 701, 702); relevance (FRE 401)
12/16/2021	Adam Vary	142:25-143:1	142	25	143	1	142:25-143:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	143:3-5	143	3	143	5	143:3-5 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	143:12-13	143	12	143	13	143:12-13 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	143:15-18	143	15	143	18	143:15-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						

12/16/2021	Adam Vary	143:25-144:1	143	25	144	1	143:25-144:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	144:3-5	14	43	144	5	143:3-144:Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	144:13-14	144	13	144	14	144:13-14 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	144:16-18	144	16	144	18	144:16-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	145:1-2	145	1	145	2	145:1-2 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	146:2-3	146	2	146	3	146:2-3 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	146:12-13	146	12	146	13	146:12-13 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	147:5-8	147	5	147	8	147:5-8 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	147:12-13	147	12	147	13	147:12-13 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

12/16/2021	Adam Vary	147:15-18	147	15	147	18	147:15-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	147:25-148:1	147	25	148	1	147:25-148:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	148:3-17	148	3	148	17							
12/16/2021	Adam Vary	148:18-19	148	18	148	19							
12/16/2021	Adam Vary	148:24-149:10	148	24	149	10	149:8-10 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	149:18-19	149	18	149	19	149:18-19 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	149:21-150:10	149	21	150	10							
12/16/2021	Adam Vary	154:24-156:6	154	24	156	6							
12/16/2021	Adam Vary	156:19-157:1	156	19	157	1							
12/16/2021	Adam Vary	157:8-18	157	8	157	18	157:12-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	157:22-23	157	22	157	23	157:22-23 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	157:25-158:1	157	25	158	1	157:25-158:1 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	158:11-17	158	11	158	17	158:11-12 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						



12/16/2021	Adam Vary	158:24-159:13	158	24	159	13	159:3-13 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	159:23-24	159	23	159	24	159:23-24 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	160:2-25	160	2	160	25							
12/16/2021	Adam Vary	161:9-10	161	9	161	10							
12/16/2021	Adam Vary	162:10-16	162	10	162	16							
12/16/2021	Adam Vary	162:20-163:8	162	20	163	8							
12/16/2021	Adam Vary	163:20-164:8	163	20	164	8	164:6-8 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	164:15-22	164	15	164	22	164:15-16 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value; 164:18-22 Argumentative, lacks foundation.						
12/16/2021	Adam Vary	165:2-11	165	2	165	11							
12/16/2021	Adam Vary	166:13-16	166	13	166	16	166:13-16 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	166:24-25	166	24	166	25	166:24-25 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	167:1-12	167	1	167	12	167:2-9 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative. 167:10-12 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						

12/16/2021	Adam Vary	167:19-20	167	19	167	20	167:19-20 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	167:22-24	167	22	167	24	167:22-24 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	168:7-8	168	7	168	8	168:7-8 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	170:1-3	170	1	170	3	170:1-3 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	170:9-10	170	9	170	10	170:9-10 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	171:20-22	171	20	171	22	171:20-22 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	172:4-5	172	4	172	5	172:4-5 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	172:7-15	172	7	172	15							
12/16/2021	Adam Vary	172:25-174:1	172	25	174	1	172:25-173:23 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative. 173:24-174:1 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						

12/16/2021	Adam Vary	174:6-7	174	6	174	7	174:6-7 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	174:9-11	174	9	174	11	174:9-11 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	174:17-18	174	17	174	18	174:17-18 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	174:20-175:4	174	20	175	4	174:20-175:4 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	175:23-176:10	175	23	176	10	175:23-176:10 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	176:17-21	176	17	176	23	176:17-23 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	177:3-5	177	3	177	5	177:3-5 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	177:7-8	177	7	177	8	177:7-8 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	177:16-17	177	16	177	17	177:16-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	177:19-22	177	19	177	22	177:19-22 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation.						

12/16/2021	Adam Vary	178:6-7	178	6	178	7	178:6-7 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	178:9-12	178	9	178	12	178:9-12 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation, argumentative.						
12/16/2021	Adam Vary	178:20-21	178	20	178	21	178:20-21 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	179:13-16	179	13	179	16	179:13-16 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	179:19-20	179	19	179	20	179:19-20 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	179:22-24	179	22	179	24	179:22-24 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	180:5-6	180	5	180	6	180:5-6 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	180:8-10	180	8	180	10	180:8-10 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	180:16-17	180	16	180	17	180:16-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

12/16/2021	Adam Vary	181:5-9	181	5	181	9	181:5-9 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	181:15-16	181	15	181	16	181:15-16 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	181:18-20	181	18	181	20	181:18-20 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	181:23-24	181	23	181	24	181:23-23 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	182:2-4	182	2	182	4	182:2-4 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, vague.						
12/16/2021	Adam Vary	182:11-12	182	11	182	12	182:11-12 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	182:14-18	182	14	182	18	182:14-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	182:24-25	182	24	182	25	182:24-25 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	183:2-6	183	2	183	6	183:2-6 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation.						
12/16/2021	Adam Vary	183:13-14	183	13	183	14	183:13-14 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

12/16/2021	Adam Vary	183:16-18	183	16	183	18	Relevance, probative value substantially						
12/16/2021	Adam Vary	183:25-184:1	183	25	184	1	refused to answer the question on the						
12/16/2021	Adam Vary	188:25-189:2	188	25	189	2	188:25-198:2 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	189:8-9	189	8	189	9	189:8-9 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	189:17-190:1	189	17	190	1	189:17-190:1 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	190:5-6	190	5	190	6	190:5-6 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	190:13-17	190	13	190	17	190:13-17 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	190:23-25	190	23	190	25	190:23-25 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	195:13-22	195	13	195	22	195:13-22 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative.						
12/16/2021	Adam Vary	196:18-197:1	196	18	197	1	196:18-197:1 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative.						
12/16/2021	Adam Vary	199:20-23	199	20	199	23	199:20-23 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	200:6-7	200	6	200	7	200:6-7 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

12/16/2021	Adam Vary	200:9-11	200	9	200	11	200:9-11 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation, calls for speculation.						
12/16/2021	Adam Vary	200:19-20	200	19	200	20	200:19-20 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	200:24-201:1	200	24	201	1	200:24-201 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation, calls for speculation.						
12/16/2021	Adam Vary	201:9-10	201	9	201	10	201:9-10 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	201:14-22	201	14	201	22	201:14-22 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative.						
12/16/2021	Adam Vary	202:11-12	202	11	202	12	202:11-12 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	202:19-20	202	19	202	20	202:19-20 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	202:22-24	202	22	202	24	202:22-24 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, calls for speculation.						
12/16/2021	Adam Vary	203:6-7	203	6	203	7	203:6-7 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

12/16/2021	Adam Vary	203:9-11	203	9	203	11	203:9-11 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	203:18-19	203	18	203	19	203:18-19 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	203:21-204:7	203	21	204	7	203:21-204:7 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative.						
12/16/2021	Adam Vary	208:6-18	208	6	208	18	208:6-18 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative.						
12/16/2021	Adam Vary	208:25-209:2	208	25	208	2	208:25-209:2 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, cumulative.						
12/16/2021	Adam Vary	209:11-13	209	11	209	13	209:11-13 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	209:20-21	209	20	209	21	209:20-21 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	209:23-210:1	209	23	210	1	209:23-210:1 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	210:8-9	201	8	201	9	210:8-9 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	213:16-214:2	213	16	214	2	213:16-214:2 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, calls for speculation.						



12/16/2021	Adam Vary	214:10-11	214	10	214	11	214:10-11 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	214:14-15	214	14	214	15	214:14-15 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation.						
12/16/2021	Adam Vary	215:1-2	215	1	215	2	215:1-2 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	216:6-9	216	6	216	9	216:6-9 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, Best Evidence Rule.						
12/16/2021	Adam Vary	216:13	216	13	216	13	216:13 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, Best Evidence Rule.						
12/16/2021	Adam Vary	216:18-217:2	216	18	217	2	216:18-217:2 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, Best Evidence Rule.						
12/16/2021	Adam Vary	217:6-9	217	6	217	9	217:6-9 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, Best Evidence Rule.						
12/16/2021	Adam Vary	217:11-12	217	11	217	12	217:11-12 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, argumentative, lacks foundation, assuming facts not in evidence.						
12/16/2021	Adam Vary	217:21-218:1	217	21	218	1	217:21-218:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	218:3-6	218	3	218	6	218:3-6 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation.						

12/16/2021	Adam Vary	218:9-12	218	9	218	12	218:9-12 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	218:14-19	218	14	218	19	218:14-19 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	219:3-5	219	3	219	5	219:3-5 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	219:7-8	219	7	219	8	219:7-8 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	219:16-18	219	16	219	18	219:16-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	219:19-20	219	19	219	20	219:19-20 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	220:2-3	220	2	220	3	220:2-3 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	220:5-6	220	5	220	6	220:5-6 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	220:13-14	220	13	220	14	220:13-14 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

12/16/2021	Adam Vary	220:16-18	220	16	220	18	220:16-18 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	220:25-221:1	220	25	221	1	220:25-221:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	221:3-4	221	3	221	4	221:3-4 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	221:11-12	221	11	221	12	221:11-12 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	241:4-18	241	4	241	18							
12/16/2021	Adam Vary	241:21-23	241	21	241	23							
12/16/2021	Adam Vary	250:15-23	250	15	250	23	250:15-23 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.						
12/16/2021	Adam Vary	273:24-274:3	273	24	275	3	273:24-274:3 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time.						
12/16/2021	Adam Vary	274:10-275:4	274	1	275	4	274:10-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value; 274:19-275:4 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, lacks foundation, Best Evidence Rule.						
12/16/2021	Adam Vary	275:8-12	275	8	275	12	275:8-12 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, lacks foundation, Best Evidence Rule.						

12/16/2021	Adam Vary	275:14-17	275	14	275	17	275:14-17 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation.						
12/16/2021	Adam Vary	275:25-276:1	275	25	276	1	275:25-276:1 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						
12/16/2021	Adam Vary	276:3-6	276	3	276	6	276:3-6 Privilege asserted by witness. Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, lacks foundation.						
12/16/2021	Adam Vary	276:15-17	276	15	276	17	276:15-17 Nonresponsive. The witness refused to answer the question on the advice of counsel asserting privilege and therefore the answer has no evidentiary value.						

Deposition		Defenant Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Counter-Designations					Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
1/31/2022	Kathe Green	5:15-23	5	15	5	23		6:12-7:3	6	12	7	3	
1/31/2022	Kathe Green	6:1-11	6	1	6	111		7:11-20	7	11	7	20	
1/31/2022	Kathe Green	10:3-12	10	3	10	12		8:15-9:14	8	15	9	14	Relevance (FRE 401); undue consumption of time (FRE 403)
1/31/2022	Kathe Green	10:24-11:7	10	24	11	7		9:25-10:2	9	25	10	2	Relevance (FRE 401); undue consumption of time (FRE 403)
1/31/2022	Kathe Green	13:4-11	13	4	13	11		10:13-10:23	10	12	10	23	
1/31/2022	Kathe Green	14:3-10	14	3	14	10		11:8-9	11	8	11	9	
1/31/2022	Kathe Green	15:1-13	15	1	15	13		11:17-12:25	11	17	12	25	
1/31/2022	Kathe Green	26:4-27:3	26	4	27	3		14:11-21	14	11	14	21	
1/31/2022	Kathe Green	27:17-28:20	27	17	28	20		15:14-17	15	14	15	17	
1/31/2022	Kathe Green	33:25-34:8	33	25	34	8		15:22-16:7	15	22	16	7	
1/31/2022	Kathe Green	34:14-18	34	14	34	18		16:18-23	16	18	16	23	
1/31/2022	Kathe Green	34:24-35:15	34	24	35	15		17:5-14	17	5	17	14	
1/31/2022	Kathe Green	40:9-13	40	9	40	13		18:21-19-8	18	21	19	8	
1/31/2022	Kathe Green	41:9-11	41	9	41	11		19:14-19:24	19	14	19	24	
1/31/2022	Kathe Green	41:18-20	41	18	41	20		21:15-22	21	15	21	22	
1/31/2022	Kathe Green	42:6-11	42	6	42	11	42:6-11 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, vague as to time she saw the show.	22:9-13	22	9	22	13	
1/31/2022	Kathe Green	44:10-45:6	44	10	45	6	44:10-45:6 Lacks foundation, speculation, no personal knowledge, relies on hearsay, improper lay opinion, relevance, probative value substantially outweighed by a danger of misleading the jury, unfair prejudice, confusing the issues, undue delay, wasting time.	29:14-23	29	14	29	23	Relevance (FRE 401)
1/31/2022	Kathe Green	45:20-25	45	20	45	25	45:20-25 Objection to everything after "No," as non-responsive.	30:6-16	30	6	30	16	30:6-8: Counsels' comments are not evidence
1/31/2022	Kathe Green	46:3-7	46	3	46	7	46:6-7 Objection as non-responsive.	30:22-31:10	30	22	31	10	
1/31/2022	Kathe Green	46:9	46	9	46	9	46:9 Objection as non-reponsive.	31:21-32:6	31	21	32	6	
1/31/2022	Kathe Green	50:23-25	50	23	50	25		32:15-33:24	32	15	33	24	
1/31/2022	Kathe Green	52:25-53:9	52	25	53	9		34:9-13	34	9	34	13	
1/31/2022	Kathe Green	54:8-11	54	8	54	11		35:16-18	35	16	35	18	
1/31/2022	Kathe Green	54:15-19	54	15	54	19		36:13-37:12	36	13	37	12	
1/31/2022	Kathe Green	55:22-56:18	55	22	56	18		37:17	37	17	37	17	
1/31/2022	Kathe Green	56:25-57:18	56	25	57	18		40:14-18	40	14	40	18	
1/31/2022	Kathe Green	57:25-58:12	57	25	58	12	57:25-58:12 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time.	41:2-3	41	2	41	3	
1/31/2022	Kathe Green	61:9-15	61	9	61	15		41:6-8	41	6	41	8	
1/31/2022	Kathe Green	65:5-11	65	5	65	11		41:12-17	41	12	41	17	
1/31/2022	Kathe Green	66:15-67:24	66	15	67	24		43:5-23	43	5	43	23	
1/31/2022	Kathe Green	69:1-70:10	69	1	70	10		47:18-48:12	47	18	48	12	
1/31/2022	Kathe Green	73:13-18	73	13	73	18	73:13-15 Lacks foundation, calls for speculation.	48:14-49:6	48	14	49	6	
1/31/2022	Kathe Green	74:15-17	74	15	74	17		49:21-50:7	49	21	50	7	
1/31/2022	Kathe Green	74:21-75:4	74	21	75	4		50:19-22	50	19	50	22	
1/31/2022	Kathe Green	75:8-22	75	8	75	22		51:1-3	51	1	51	3	
1/31/2022	Kathe Green	76:4-6	76	4	76	6		51:7-9	51	7	51	9	
1/31/2022	Kathe Green	76:8-77:3	76	8	77	3		53:10-22	53	10	53	22	
1/31/2022	Kathe Green	77:22-78:8	77	22	78	8		54:5-7	54	5	54	7	
1/31/2022	Kathe Green	78:11-21	78	11	78	21	78:13-21 Objection to everything after "I don't know," as calling for speculation and guessing.	54:12-14	54	12	54	14	
1/31/2022	Kathe Green	90:15-18	90	15	90	18		54:20-55:15	54	20	55	15	
1/31/2022	Kathe Green	91:23-92:11	91	23	92	11	91:23-92:11 Relevance, probative value substantially outweighed by a danger of confusing the issues, undue delay, wasting time, prejudicial, lacks probative value as it was before the time defendant Spacey rented the apartment.	55:20-21	55	20	55	21	
1/31/2022	Kathe Green	92:18-93:1	92	18	93	1	93:1 Objection to form, leading.	59:7-16	59	7	59	16	

1/31/2022	Kathe Green	93:4-6	93	4	93	6	93:5-6 Objection to form, leading.	60:2-8	60	2	60	8	
1/31/2022	Kathe Green	93:9-12	93	9	93	12	93:10-11 Objection to form, leading.	60:16-62:2	60	16	62	2	62:1-2: Vouching; Relevance (FRE 401)
1/31/2022	Kathe Green	94:2-5	94	2	94	5	94:2-5 Objection to form, leading.	62:13-24	62	13	62	24	
1/31/2022	Kathe Green	94:8-9	94	8	94	9	94:8-9 Non-responsive.	63:5-20	63	4	63	20	
1/31/2022	Kathe Green	94:18-21	94	18	94	21	94:18-21 Leading, asked and answered, cumulative.	63:24-64:10	63	24	64	10	
1/31/2022	Kathe Green	95:19-22	95	19	95	22	95:19-21 Objection to form, leading.	65:24-66:7	65	24	66	7	
1/31/2022	Kathe Green	97:4-5	97	4	97	5	97:4-5 Objection to form, leading.	67:25-68:9	67	25	68	9	
1/31/2022	Kathe Green	97:7-10	97	7	97	10	97:8-10 Objection to form, leading.	68:15-23	68	15	68	23	
1/31/2022	Kathe Green	97:13-15	97	13	97	15	97:14-15 Objection to form, leading.	70:11-71:3	70	11	71	3	70:11-13: Argumentative
1/31/2022	Kathe Green	97:18-20	97	18	97	20		71:6-13	71	6	71	13	71:12-13: Vouching
1/31/2022	Kathe Green	98:1-4	98	1	98	4	98:1-4 Objection to form, leading.	71:15-22	71	15	71	22	
1/31/2022	Kathe Green	100:15-18	100	15	100	18	100:15-18 Objection to form, leading, vague as to time.	71:25-72:13	71	25	72	13	
1/31/2022	Kathe Green	100:21-25	100	21	101	25	100:21-22 Vague as to time; 100:23-25 Objection to form, leading, lacks foundation, calls for speculation.	72:15-17	72	15	72	17	Vague
1/31/2022	Kathe Green	101:3-10	101	3	101	10	101: 3-4 Lacks foundation, calls for speculation; 101:5-7, 101:9-10 Objection to form, leading.	72:19	72	19	72	19	
1/31/2022	Kathe Green	101:12	101	12	101	12		72:23-24	72	23	72	24	
1/31/2022	Kathe Green	101:14	101	14	101	14		73:3-12	73	3	73	12	
1/31/2022	Kathe Green	101:17-24	101	17	101	24	101:17-20, 22-23 Objection to form, leading, lacks foundation, calls for speculation, nonresponsive; 101:24 Lacks foundation, calls for speculation, lacks personal knowledge.	73:19-22	73	19	73	22	Argumentative
1/31/2022	Kathe Green	102:2-3	102	2	102	3	101:2-3 Lacks foundation, calls for speculation, nonresponsive, asked and answered, probative value substantially outweighed by a danger of wasting time.	77:4-6	77	4	77	6	Argumentative
1/31/2022	Kathe Green	102:6	102	6	102	6	102:6 Lacks foundation, calls for speculation, nonresponsive, asked and answered, probative value substantially outweighed by a danger of wasting time.	77:11	77	11	77	11	
1/31/2022	Kathe Green							77:15-21	77	15	77	21	77: 21: Relevance (FRE 401); counsel's statements are not evidence
1/31/2022	Kathe Green							78:22-24	78	22	78	24	
1/31/2022	Kathe Green							79:4-10	79	4	79	10	Asked and answered
1/31/2022	Kathe Green							79:17-22	79	17	79	22	79:20-22: Vague and ambiguous
1/31/2022	Kathe Green							80:14-16	80	14	80	16	
1/31/2022	Kathe Green							80:18-81:3	80	18	81	3	
1/31/2022	Kathe Green												Foundation/lacks personal knowledge (FRE 602)
1/31/2022	Kathe Green							82:13-23	82	13	82	23	
1/31/2022	Kathe Green							83:6-11	83	6	83	11	
1/31/2022	Kathe Green							83:21-22	83	21	83	22	Relevance (FRE 401)
1/31/2022	Kathe Green							84:1-4	84	1	84	4	Relevance (FRE 401)
1/31/2022	Kathe Green							87:5-7	87	5	87	7	Relevance (FRE 401)
1/31/2022	Kathe Green												Relevance (FRE 401); undue consumption of time (FRE 403); Hearsay (FRE 801, 802)
1/31/2022	Kathe Green							88:7-89:10	88	7	89	10	
1/31/2022	Kathe Green							89:15-18	89	15	89	18	
1/31/2022	Kathe Green							89:22	89	22	89	22	Asked and answered; cumulative (FRE 403)
1/31/2022	Kathe Green							89:24-90:6	89	24	90	6	
1/31/2022	Kathe Green							90:10	90	10	90	10	
1/31/2022	Kathe Green												Asked and answered; cumulative (FRE 403)
1/31/2022	Kathe Green							91:6-22	91	6	91	22	
1/31/2022	Kathe Green							93:13-15	93	13	93	15	
1/31/2022	Kathe Green							93:18	93	18	93	18	
1/31/2022	Kathe Green												Foundation/lacks personal knowledge (FRE 602)
1/31/2022	Kathe Green							94:22-25	94	22	94	25	
1/31/2022	Kathe Green							95:23-96:10	95	23	96	10	
1/31/2022	Kathe Green							96:12-18	96	12	96	18	
1/31/2022	Kathe Green							96:21	96	21	96	21	
1/31/2022	Kathe Green							97:21-23	97	21	97	23	

1/31/2022	Kathe Green							97:25	97	25	97	25	
-----------	-------------	--	--	--	--	--	--	-------	----	----	----	----	--

Deposition		Defenant Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Counter-Designations					Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
1/5/2022	Tracie Thoms	5:18-23	5	18	5	23		9:23-11:7	9	23	11	7	Relevance (FRE 401); undue consumption of time (FRE 403)
1/5/2022	Tracie Thoms	6:9-12	6	9	6	12		12:9-19	12	9	12	19	Relevance (FRE 401); undue consumption of time (FRE 403)
1/5/2022	Tracie Thoms	6:15-19	6	15	6	19		13:14-19	13	14	13	19	
1/5/2022	Tracie Thoms	7:2-12	7	2	7	12		14:13-24	14	13	14	24	Hearsay (FRE 801, 802)
1/5/2022	Tracie Thoms	7:17-21	7	17	7	21	7:17-21 Mischaracterizes the testimony, calls for hearsay.	26:20-22	26	20	26	22	
1/5/2022	Tracie Thoms	7:24-8:19	7	24	8	19		26:25-28:15	26	25	28	15	
1/5/2022	Tracie Thoms	9:14-16	9	14	9	16	9:14-16 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	28:25-29:9	28	25	29	9	
1/5/2022	Tracie Thoms	9:21	9	21	9	21	9:21 Lacks personal knowledge.	31:17-23	31	17	31	23	
1/5/2022	Tracie Thoms	13:4-13	13	4	13	13		36:2-14	36	2	36	14	
1/5/2022	Tracie Thoms	13:20-23	13	20	13	23		38:9-16	38	9	38	16	
1/5/2022	Tracie Thoms	14:5-12	14	5	14	12							
1/5/2022	Tracie Thoms	18:17-19:5	18	17	19	5	18:17-19:5 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.						
1/5/2022	Tracie Thoms	26:14-19	26	14	26	19							
1/5/2022	Tracie Thoms	28:16-24	28	16	28	24							
1/5/2022	Tracie Thoms	29:13-30:3	29	13	30	3							
1/5/2022	Tracie Thoms	30:6-10	30	6	30	10							
1/5/2022	Tracie Thoms	30:12-15	30	12	30	15							
1/5/2022	Tracie Thoms	30:21-31:13	30	21	31	13							
1/5/2022	Tracie Thoms	31:24-32:5	31	24	32	5							
1/5/2022	Tracie Thoms	33:4-7	33	4	33	7							
1/5/2022	Tracie Thoms	33:10	33	10	33	10							
1/5/2022	Tracie Thoms	38:17-21	38	17	38	21							
1/5/2022	Tracie Thoms	39:19-40:7	39	19	40	7							
1/5/2022	Tracie Thoms	42:20-25	42	20	42	25							
1/5/2022	Tracie Thoms	43:2-44:7	43	2	44	7							
1/5/2022	Tracie Thoms	47:5-22	47	5	47	22	47:5-22 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						



1/5/2022	Tracie Thoms	48:7-17	48	7	48	17	48:7-17 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	48:23-49:16	48	23	49	16	48:23-49:16 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	49:25	49	25	49	25	49:25 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	50:5-16	50	5	50	16	50:5-16 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	50:19-24	50	19	50	24	50:19-24 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	51:5-10	51	5	51	10	51:5-10 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						

1/5/2022	Tracie Thoms	51:14	51	14	51	14	51:14 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	51:16-20	51	16	51	20	51:16-20 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	52:2	52	2	52	2	52:2 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	52:4-5	52	4	52	5	52:4-5 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	52:10	52	10	52	10	52:10 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	52:12-18	52	12	52	18	52:12-18 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						

1/5/2022	Tracie Thoms	52:23	52	23	52	23	52:23 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	52:25-53:3	52	25	53	3	52:25-53:3 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	53:13-54:3	53	13	54	3	53:13-54:3 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	54:7	54	7	54	7	54:7 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	54:9-14	54	9	54	14	54:9-14 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, calls for expert testimony, lacks foundation, vague, calls for speculation.						
1/5/2022	Tracie Thoms	56:5-10	56	5	56	10							
1/5/2022	Tracie Thoms	56:22-57:12	56	22	57	12	57:6-12 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, argumentative, assumes facts not in evidence.						



Deposition		Defenant Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Counter-Designations					Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
4/29/2021	Erin Quill	5:17-18	5		5			6:3-9	6	3	6	9	
4/29/2021	Erin Quill	47:25-50:18	47		50			7:7-8:11	7	7	8	11	
4/29/2021	Erin Quill	51:14-52:25	51		51		51:14-52:25 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, lack of personal knowledge, vague.	12:2-5	12	2	12	5	
4/29/2021	Erin Quill	53:6-20	53		53		53:6-20 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, lack of personal knowledge, vague.	36:16-42:12	36	16	42	12	Relevance (FRE 401); undue consumption of time (FRE 403); 41:24-45: 12: lack of personal knowledge/speculation (FRE 602); unfairly prejudicial, misleads the jury, confuses the issues (FRE 403); relevance (FRE 401)
4/29/2021	Erin Quill	54:22-25	54		54		53:6-25 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, lack of personal knowledge, vague.	67:11-13	67	11	67	13	
4/29/2021	Erin Quill	56:3-25	56		56		56:3-25 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for speculation, vague.	68:4-15	68	4	68	15	
4/29/2021	Erin Quill	57:19-58:8	57		57		57:19-58:8 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for speculation, vague, non-responsive.	76:16-17	76	16	76	17	
4/29/2021	Erin Quill	63:20-64:3	63		64		63:20-64:3 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	76:20-21	76	20	76	21	

4/29/2021	Erin Quill	65:5-66:24	65		66	6:22-24 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, vague.	78:10-16	78	10	78	16	
4/29/2021	Erin Quill	67:2-10	67		67	67:2-10 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, vague, calls for speculation, lacks personal knowledge.	105:5-8	105	5	105	8	
4/29/2021	Erin Quill	67:14-68:3	67		68	67:14-68:3 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, vague, calls for speculation, lacks personal knowledge, calls for improper lay opinion.	105:12-106:10	105	12	106	10	Relevance (FRE 401); undue consumption of time, unfairly prejudicial (FRE 403)
4/29/2021	Erin Quill	69:1-70:1	69		70	69:1-70:1 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	107:9-109:1	107	9	109	1	
4/29/2021	Erin Quill	70:14-22	70		70	70:14-22 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	110:16-112:7	110	16	112	7	111: 18-25: nonresponsive; unfairly prejudicial (FRE 403)
4/29/2021	Erin Quill	73:7-14	73		73	73:7-14 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	161:14-162:4	161	14	162	4	
4/29/2021	Erin Quill	73:16-74:14	73		74	73:16-74:14 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	162:6	162	6	162	6	

4/29/2021	Erin Quill	76:1-15	76		76	76:1-15 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	162:8-22	162	8	162	22	
4/29/2021	Erin Quill	76:23-77:25	76		77	76:23-77:25 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	172:4-9	172	4	172	9	
4/29/2021	Erin Quill	78:17-79:19	78		79	78:17-79:19 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, calls for improper lay opinion, lacks foundation, lacks personal knowledge, calls for speculation.	172:11-173:4	172	11	173	4	Nonresponsive
4/29/2021	Erin Quill	84:1-11	84		84	84:1-11 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge.	173:16-19	173	16	173	19	
4/29/2021	Erin Quill	85:9-15	85		85		174:14-17	174	14	174	17	
4/29/2021	Erin Quill	86:9-21	86		86	86:9-21 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	174:20-175:10	174	20	175	10	174:22--175: 10 Nonresponsive
4/29/2021	Erin Quill	86:25-87:16	86		87	86:25-87:16 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	183:5-20	183	5	183	20	Nonresponsive

4/29/2021	Erin Quill	87:22-88:2	87		88	87:22-88:2 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	189:19-22	189	19	189	22	
4/29/2021	Erin Quill	88:18-89:18	88		89	88:18-89:18 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	190:6-14	190	6	190	14	
4/29/2021	Erin Quill	91:22-92:12	91		92	91:22-92:12 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	190:21-191:1	190	21	191	1	
4/29/2021	Erin Quill	93:18-94:2	93		94	93:18-94:2 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	191:7-17	191	7	191	17	
4/29/2021	Erin Quill	94:7-23	94		94	94:7-23 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	193:4-6	193	4	193	6	
4/29/2021	Erin Quill	101:5-103:14	101		103	101:5-103:14 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.	249:5-7	249	5	249	7	
4/29/2021	Erin Quill	104:14-17	104		104							
4/29/2021	Erin Quill	104:22-105:4	104		105							
4/29/2021	Erin Quill	106:11-107:8	106		107							
4/29/2021	Erin Quill	109:2-110:15	109		110							
4/29/2021	Erin Quill	127:18-129:11	127		129							
4/29/2021	Erin Quill	160:25-161:13	160		161							



4/29/2021	Erin Quill	162:24-163:6	162		163								
4/29/2021	Erin Quill	165:23-167:3	165		167								
4/29/2021	Erin Quill	167:19-168:6	167		168								
4/29/2021	Erin Quill	168:21-169:17	168		169								
4/29/2021	Erin Quill	169:20-170:8	169		170								
4/29/2021	Erin Quill	171:5-172:3	171		172								
4/29/2021	Erin Quill	173:6-11	173		173								
4/29/2021	Erin Quill	173:22-174:5	173		174								
4/29/2021	Erin Quill	174:7-8	174		174								
4/29/2021	Erin Quill	176:3-6	176		176								
4/29/2021	Erin Quill	176:10-18	176		176								
4/29/2021	Erin Quill	182:22-183:4	182		183								
4/29/2021	Erin Quill	183:21-24	183		183								
4/29/2021	Erin Quill	184:1-8	184		184								
4/29/2021	Erin Quill	189:2-18	189		189								
4/29/2021	Erin Quill	189:23-190:5	189		189								
4/29/2021	Erin Quill	190:15-20	190		190								
4/29/2021	Erin Quill	191:2-6	191		191								
4/29/2021	Erin Quill	191:18-193:3	191		193								
4/29/2021	Erin Quill	193:7-17	193		193								
4/29/2021	Erin Quill	212:12-213:17	212		213		212:12-213:17 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive, vague.						
4/29/2021	Erin Quill	213:19-215:13	213		215		213:19-215:13 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.						
4/29/2021	Erin Quill	215:15-16	215		215		215:15-16Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.						

4/29/2021	Erin Quill	215:18-21	215		215	215:18-21 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.						
4/29/2021	Erin Quill	215:25-216:20	215		16	215:25-216:20 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, lacks personal knowledge, calls for speculation, non-responsive.						
4/29/2021	Erin Quill	249:1-4	249		249							
4/29/2021	Erin Quill	250:23-24	250		250	250:23-24 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.						
4/29/2021	Erin Quill	251:1	251		251	251:1 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.						

Deposition		Defenant Kevin Fowler's Initial Designations					Plaintiff Anthony Rapp's Objections	Plaintiff Anthony Rapp's Counter-Designations					Defendant Kevin Fowler's Objections to Counter-Designations
Date	WITNESS	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION	PINCITE	Page Start	Line Start	Page End	Line End	OBJECTION
6/23/2021	Adam Rapp	7:4-5	7	4	7	5		12:13-13:7	12	13	13	7	Beyond the scope of direct testimony/improper counter designation
6/23/2021	Adam Rapp	70:15-71:5	70	15	71	5		13:19-14:7	13	19	14	7	Beyond the scope of direct testimony/improper counter designation
6/23/2021	Adam Rapp	71:16-72:24	71	16	72	24		14:14-17:9	14	14	17	9	Beyond the scope of direct testimony/improper counter designation
6/23/2021	Adam Rapp	74:2-75:12	74	2	75	12	74:2-75:12 Hearsay, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, FRE 412(a).	17:17-24	17	17	17	24	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designated portion;
6/23/2021	Adam Rapp	76:15-78:19	76	15	78	19	76:15-78:19 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, FRE 412(a).	19:25-22:19	19	25	22	19	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designated portion
6/23/2021	Adam Rapp	79:24-87:16	79	24	87	16	79:24-87:16 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, FRE 412(a).	26:17-27:17	26	17	27	17	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time
6/23/2021	Adam Rapp	88:12-19	88	12	88	19	88:12-19 Relevance, probative value substantially outweighed by a danger of confusing the issues, wasting time.	34:5-35:4	34	5	35	4	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time
6/23/2021	Adam Rapp	107:15-17	107	15	107	17	107:15-107:17 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time and fairness requires the full account be read as set forth in Plaintiff's designations pages 12 through 60.	35:12-37:2	35	12	37	2	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, misleads the jury (FRE 403)
6/23/2021	Adam Rapp	107:19-108:14	107	19	108	14	107:19-108:14 Relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time and fairness requires the full account be read as set forth in Plaintiff's designations pages 12 through 60.	46:18-47:18	46	18	47	18	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time
6/23/2021	Adam Rapp	126:24-127:23	126	24	127	23	126:24-127:23 Hearsay, relevance, probative value substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, FRE 412(a).	52:5-55:6	52	5	55	6	
6/23/2021	Adam Rapp	128:7-134:14	128	7	134	14	132:20-133:2 Objection to everything after "No," as non-responsive; 133:14-134:4 Relevance, probative value substantially outweighed by a danger of confusing the issues, misleading the jury, wasting time, calls for speculation, non-responsive.	62:7-63:14	62	7	63	14	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time (FRE 403); hearsay (FRE 801, 802)
6/23/2021	Adam Rapp	134:17-136:10	134	17	136	10	134:24-135:19 Lacks foundation, calls for speculation, non-responsive; 136:6-10 Lacks foundation, calls for speculation.	64:11-65:22	64	11	65	22	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time (FRE 403); hearsay (FRE 801, 802)
6/23/2021	Adam Rapp	136:22-137:23	136	22	137	23	137:7-23 Objection to everything after "I don't know," calls for speculation, lacks foundation.	66:19-24	66	19	66	24	Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time; hearsay (FRE 801, 802)

6/23/2021	Adam Rapp		138	24	139	18							Improper counter-designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, undue consumption of time; hearsay (FRE 801, 802)
		138:24-139:18						68:7-69:14	68	7	69	14	
6/23/2021	Adam Rapp												Relevance (FRE 401); unfairly prejudicial, confuses the issues (FRE 403)
		172:3-11	172	3	172	11		72:25-73:25	72	25	73	25	
6/23/2021	Adam Rapp												
		172:15-18	172	15	172	18		75:13-76:11	75	13	76	11	
6/23/2021	Adam Rapp												
		173:22-174:18	173	22	174	18		108:15-23	108	15	108	23	
6/23/2021	Adam Rapp												
		175:24-177:12	175	24	177	12		127:24-128:6	127	24	128	6	
6/23/2021	Adam Rapp												Improper designation: nonresponsive to Mr. Fowler's designation
								136:11-16	136	11	136	16	
6/23/2021	Adam Rapp												
								137:24-138:23	137	24	138	23	
6/23/2021	Adam Rapp		190	15	191	6	190:18-191:2 Objection to everything after "No," as non-responsive, lacks foundation, calls for speculation, relies on hearsay.						
		190:15-191:6						139:19-140:4	139	19	140	4	
6/23/2021	Adam Rapp												Improper designation: nonresponsive to Mr. Fowler's designation; cumulative, unfairly prejudicial (FRE 403); hearsay (FRE 801, 802)
								140:10-141:17	140	10	141	17	
6/23/2021	Adam Rapp		200	17	201	5							Improper designation: nonresponsive to Mr. Fowler's designation; cumulative, unfairly prejudicial (FRE 403); hearsay (FRE 1701, 1702)
		200:17-201:5					200:17-201:5 Relevance, lacks foundation, cumulative.	141:25-142:17	141	25	142	17	
6/23/2021	Adam Rapp		208	9	209	3							Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative and undue waste of time (FRE 403); Hearsay (FRE 801, 802)
		208:9-209:3					208:9-209:3 Relevance, probative value substantially outweighed by a danger of confusing the issues, wasting time, cumulative.	142:25-143:11	142	25	143	11	
6/23/2021	Adam Rapp		209	21	210	2							Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative and undue waste of time (FRE 403); Hearsay (FRE 801, 802)
		209:21-210:2					209:21-210:2 Asked and answered.	143:24-144:12	143	24	144	12	
6/23/2021	Adam Rapp		210	5	218	21	210:5-8 No foundation, calls for speculation, vague as to time; 210:9-19 Asked and answered, relevance, misleading, vague as to time; 212:3-213:7 Lacks foundation, calls for speculation, lacks personal knowledge, hearsay; 213:25-214:16 Lacks foundation, calls for speculation, lacks personal knowledge, hearsay; 214:17-215:5 Lacks foundation, hearsay, calls for speculation, lacks personal knowledge; 215:6-215:14 Lacks foundation, calls for expert testimony, improper lay opinion; 215:15-216:16 Lacks foundation, calls for speculation, calls for hearsay, lacks personal knowledge, vague;						Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, and unfairly prejudicial (FRE 403); hearsay (FRE 801, 802)
		210:5-218:21						172:19-173:21	172	19	173	21	
6/23/2021	Adam Rapp		219	18	219	24							Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; cumulative, and unfairly prejudicial (FRE 403); hearsay (FRE 801, 802); incomplete (FRE 106)
		219:18-24					219:18-22, 219:23-24 Lacks foundation, calls for speculation, improper lay opinion, improper expert opinion, vague, relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	184:18-20	184	18	184	20	

6/23/2021	Adam Rapp	220:4-10	220	4	220	10	220:4-5, 220:9-10 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, improper lay opinion, improper expert opinion, vague as to time.	187:7-11	187	7	187	11	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp	220:18-221:2	220	18	221	2	220:18-221:2 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, improper lay opinion, improper expert opinion, vague.	187:24-188:2	187	24	188	2	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp	221:7-9	221	7	221	9	221:7-9 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for speculation, improper lay opinion, improper expert opinion, vague.	188:6-8	188	6	188	8	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue waste of time and unfairly prejudicial (FRE 403); witness's refusal to answer question is not evidence
6/23/2021	Adam Rapp	221:14-20	221	14	221	20	221:14-15, 221:19-20 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, improper lay opinion, improper expert opinion, vague; 221:16-18 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	191:19-192:10	191	19	192	10	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue waste of time and unfairly prejudicial (FRE 403); vague and ambiguous; foundation/calls for speculation (FRE 602); impermissible opinion testimony (FRE 701, 702)
6/23/2021	Adam Rapp	221:24-222:7	221	24	222	7	221:24 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, improper lay opinion, improper expert opinion, vague; 221:25-222:7 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion.	202:20-203:2	202	20	203	2	
6/23/2021	Adam Rapp	222:19-23	222	19	222	23	222:19-21 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time; 222:22-23 Vague, lacks foundation, relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion.	203:19-204:4	203	19	204	4	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue consumption of time (FRE 403)
6/23/2021	Adam Rapp	222:25-223:4	222	25	223	4	222:25 Vague, lacks foundation, relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion; 223:2-4 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	204:14-205:14	204	14	205	14	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp	223:11-14	223	11	223	14	223:11-14 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion.	218:22-219:17	218	22	219	17	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation; relevance (FRE 401); undue consumption of time (FRE 403); lack of personal knowledge/speculation (FRE 611)
6/23/2021	Adam Rapp	226:18-228:5	226	18	228	5	226:18-21 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks personal knowledge; 226:22-25 Compund, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, improper lay opinion, improper expert opinion; 227:2-11 Objection to everything after "No," as non-responsive, lacks foundation, improper lay opinion, improper expert opinion. 227:12-25 Lacks foundation, calls for speculation, vague, calls for lay and expert testimony, improper lay opinion, relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time; 228:2-5 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	226:7-17	226	7	226	17	
6/23/2021	Adam Rapp	229:7-9	229	7	229	9	229:7-9 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	229:19-230:6	229	19	230	6	

6/23/2021	Adam Rapp		229	16	229	18	229:16-18 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time.	230:12-15	230	12	230	15	
6/23/2021	Adam Rapp	229:16-18	230	16	230	19	230:16-19 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lack of personal knowledge.	249:5-252:10	249	5	252	10	Improper designation: nonresponsive and irrelevant to Mr. Fowler's designation
6/23/2021	Adam Rapp	230:16-19	232	15	235	2	232:15-235:2 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for hearsay, non-responsive.	253:3-256:22	253	3	256	22	255:11--256:22: foundation/lack of personal knowledge/speculation (FRE 602)
6/23/2021	Adam Rapp	232:15-235:2	235	20	236	17	235:20-236:17 Relevance, probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, wasting time, lacks foundation, calls for hearsay, non-responsive.	257:18-24	257	18	257	24	
6/23/2021	Adam Rapp	235:20-236:17	262	17	262	23		258:2-259:5	258	2	259	5	
6/23/2021	Adam Rapp	262:17-23						259:8-15	259	8	259	15	Vague and ambiguous
6/23/2021	Adam Rapp							259:18	259	18	259	18	Relevance (FRE 401); unfairly prejudicial, misleads the jury, confuses the issues (FRE 403)
6/23/2021	Adam Rapp							260:14-22	260	14	260	22	Relevance (FRE 401); unfairly prejudicial, misleads the jury, confuses the issues (FRE 403)
6/23/2021	Adam Rapp							260:24-261:12	260	24	261	12	